

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

MICHAEL C. JONES

RASHIDA M. SMITH

A/K/A RASHIDA M. SMITH-JONES

Debtors

FREEDOM MORTGAGE CORPORATION

Movant

v.

MICHAEL C. JONES

RASHIDA M. SMITH

A/K/A RASHIDA M. SMITH-JONES

Respondents

BK. No. 17-12918-elf

Chapter No. 13

11 U.S.C. §362

CERTIFICATION OF NO ANSWER TO FREEDOM MORTGAGE CORPORATION'S
MOTION FOR RELIEF FROM AUTOMATIC STAY UNDER §362 PURSUANT TO
BANKRUPTCY PROCEDURE RULE 4001

The undersigned hereby certifies that, as of October 30, 2020, the undersigned has received no answer, objection or other responsive pleading to the Movant's Motion for Relief from Automatic Stay Under §362 Pursuant to Bankruptcy Procedure Rule 4001.

The undersigned further certifies that I have reviewed the Court's docket in this case and no answer, objection or other responsive pleading to the Movant's Motion for Relief from Automatic Stay Under §362 Pursuant to Bankruptcy Procedure Rule 4001.

Pursuant to the Notice of Motion, objections to the Movant's Motion were to be filed and served before October 22, 2020.

It is hereby respectfully requested that the Order attached to the Motion be entered at the earliest convenience of the Court.

Dated: October 23, 2020

Respectfully submitted,

Brock & Scott, PLLC

/s/ Andrew Spivack

Andrew Spivack

(Bar No. 84439)

Attorney for Creditor

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